

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE
2016 APR 4 PM 3 17
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DZHOKHAR TSARNAEV

CRIMINAL ACTION
NO. 13-10200-GAO

MOTION FOR LEAVE TO FILE REPLY

Boston Globe Media Partners, LLC (the "Globe"), by and through counsel, respectfully requests leave to file a Reply to Defendant's Opposition (D.E. 1647) to the Globe's Motion for Public Access to Criminal Justice Act Materials (D.E. 1645). The proposed Reply will assist the Court in adjudicating the motion by responding to matters raised in Defendant's Opposition and by bringing to the Court's attention the case of *United States v. Williams*, No. 06-00079 JMS/KSC, 2014 WL 2932365 (D. Haw. June 30, 2014), which addresses the statutory argument raised in the Opposition.

Respectfully submitted,

Boston Globe Media Partners, LLC

By Its Attorneys,

/s/ Emma D. Hall

Jonathan M. Albano

BBO #013850

jonathan.albano@morganlewis.com

Emma Diamond Hall

BBO #687947

emma.hall@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

One Federal Street

Boston, MA 02110-1726

+1.617.341.7700

Dated: April 4, 2016

CERTIFICATE OF SERVICE

I, Emma D. Hall, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 4, 2016.

/s/Emma Diamond Hall

Emma Diamond Hall